EXHIBIT G

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

SUSAN B. LONG, *et al.*	)
	)
Plaintiffs,	)
	)
v.	) Civil No. 1:14-cv-109 (AM)
	)
IMMIGRATION AND CUSTOMS	)
ENFORCEMENT, *et al.*	)
	)
Defendants.	)
	)

**SUPPLEMENTAL DECLARATION OF JEFF WILSON
IN SUPPORT OF THE UNITED STATES DEPARTMENT OF HOMELAND
SECURITY'S MOTION FOR SUMMARY JUDGMENT**

I.   INTRODUCTION

I, Jeff Wilson, pursuant to 28 U.S.C. § 1746, hereby declare as follows:

1.   I am the Unit Chief of the Information Technology Management Unit (the "ITM

Unit") within Enforcement and Removal Operations ("ERO") Law Enforcement and Systems

Analysis ("LESA") at U.S. Immigration and Customs Enforcement ("ICE"). I have held this

position (formerly known as the "Information Technology and Modernization Unit") since

August 2010. I served as the Acting Chief for the Modernization Unit from December 2008

until accepting the position. Prior to joining ICE in 2007 as a Management and Program

Analyst, I spent 16 years at the United States Treasury Department holding an array of positions

in the budget and information technology fields. The LESA ITM Unit mailing address is 500

12th Street, S.W., STOP 5009, Washington, D.C. 20536-5009.

1

PLAINTIFFS ASSERT THAT ICE HAS PREVIOUSLY PROVIDED

"EXTRACTS OF DATA FROM THE IIDS DATABASE"

12.   Presently and in the past the ICE, Enforcement and Removal Operations Unit, Law

Enforcement and Systems Analysis Unit (LESA), in response to detailed requests by TRAC, has

created queries to run in an applicable datamart in order to pull the specified data elements

requested by the individuals. In addition, LESA has in the past compiled anonymized

spreadsheets containing the information sought. For example, in a February 3, 2014 request

submitted by Susan B. Long and David Burnham on behalf of the Transactional Records Access

Clearinghouse, TRAC requested "anonymous case-by-case information on each removal and

return for January 2014." The request specifically asked for 54 data elements for each individual

removed/returned; the data elements include, inter alia, biographical information, criminal

history, and immigration history for every individual removed/returned for a limited period of

time, January 1-31, 2014. See Exhibit 29. The Agency was able to provide this information

without releasing personally identifiable information or database information capable of

compromising the system in the manner requested in the instant case.

As the spreadsheet reflects (Plaintiffs' Exhibit K), the agency is willing to release

responsive information that is not subject to a specific FOIA exemption as long as that

information does not require the agency to release personally identifiable information and it does

not require the release of information capable of compromising its databases such as column or

data type names in the spreadsheet. As with all reports, LESA converts specific column and data

type names into plain language to facilitate understanding of the data. This process ensures that

the nature of the data (i.e. country of citizenship) is identified for the requester but the agency's

database infrastructure is protected from disclosure. This course of action was decided upon by

7